ALVERSON TAYLOR & SANDERS

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1	ALVERSON TAYLOR & SANDERS	
	SHIRLEY BLAZICH, ESQ. Nevada Bar No. 008378	
2	BLAKELY STAUFFER, ESQ.	
3	Nevada Bar No.014956 6605 Grand Montecito Pkwy., Suite 200	
4	Las Vegas, NV 89149	
5	(702) 384-7000 Attorneys for Defendant	
6	Defendant Rentokil North America, Inc.	
7	Incorrectly Named As Rentokil Inc. d/b/a Western Pest Control	
8	LINITED STATES DISTRICT COLUT	
	UNITED STATES DISTRICT COURT	
9	DISTRICT OF NEVADA	
10		
11	DARI ISAIAS PEREIRA,	Case No. 2:19-cv-01927
12	Plaintiff,	
13	VS.	STIPULATION AND ORDER TO
14	DENTOKH ING 1/L/, WESTERN DEST	CONTINUE EARLY NEUTRAL EVALUATION
15	RENTOKIL INC. d/b/a WESTERN PEST CONTROL; a Nevada Business; DOES I through	EVALUATION
16	X, inclusive, and ROE BUSINESS ENTITIES I through X, inclusive,	
17	Defendant.	
18		
19	The parties to this case, by and through their respective counsel of record, HERE	
20	STIPULATE AND AGREE to continue the Early Neutral Evaluation ("ENE") session set	
21	February 3, 2020 at 9:00 a.m. pursuant to the Court's November 6, 2019 Order (ECF. No.	
22		
23	The parties request that the ENE session be continue	ea to <u>iMarch 27, 2020 at 9:30 a.m.</u>

This stipulation is not made for the purpose of delay. Rather, several reasons exist demonstrating why the requested continuance is for good cause. First, General Counsel for Defendant Rentokil North America, Inc., incorrectly named as Rentokil Inc. d/b/a Western Pest Control, wishes to attend the ENE but will be travelling to Nevada from out of state and

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requires a different date. Second, due to the fact that the ENE is currently set for a date already outside the required 90-day deadline outlined in LR 16-6(d), the extension would not on its own petition the Court to venture outside any deadlines set by the Local Rules. Lastly, the parties have already confirmed with the Magistrate Judge's Judicial Assistant the Court's availability to conduct the ENE on March 27, 2020—which is one of the earliest dates the Court has available and only a few short weeks after the currently-scheduled ENE. As such, the proposed extension, should the Court grant it, would not over congest the Court's calendar, but rather, allow the ENE to be conducted within a reasonable timeframe and resolve any unnecessary scheduling conflicts with the parties.

Accordingly, based on the aforementioned reasons, the parties request the Court find that they have shown good cause to continue the ENE session to March 27, 2020 at 9:30 a.m.

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By

DATED this 10th day of January, 2020.

ALVERSON TAYLOR & SANDERS

DATED this 10th day of January, 2020.

ISSO & HUGHES LAW FIRM

/s/ Jennifer Isso

/s/ Shirley Blazich

By JENNIFER ISSO, ESQ. Nevada Bar No. 13157 2470 St. Rose Parkway #306f Henderson, Nevada 89074 Attorneys for Plaintiff DARI ISAIAS PEREIRA

SHIRLEY BLAZICH, ESQ. Nevada Bar No. 008378 BLAKELY STAUFFER, ESQ. Nevada Bar No. 14956 6605 Grand Montecito Parkway, Suite 200 Las Vegas, Nevada 89149 Attorneys for Defendant RENTOKIL NORTH AMERICA INC., incorrectly named as RENTOKIL INC. d/b/a

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SB-26414

WESTERN PEST CONTROL

ALVERSON TAYLOR & SANDERS

IT IS SO ORDERED:

The Early Neutral Evaluation session in this matter shall be continued to March 27, 2020 at 9:30 a.m. The parties' confidential written ENE statement shall be submitted no later than 4:00p.m. on March 20, 2020.

DATED: _January 13, 2020

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